



San Joaquin River Group

Public Comment
Recycled Water Policy
Deadline: 12/22/08 by 12 noon

- Modesto Irrigation District
- Turlock Irrigation District
- South San Joaquin Irrigation District
- San Joaquin River Exchange Contractors

P.O. Box 4060
Modesto, CA 95352
(209) 526-7405
(209) 526-7315-Fax

- Merced Irrigation District
- Oakdale Irrigation District
- Friant Water Authority
- City and County of San Francisco

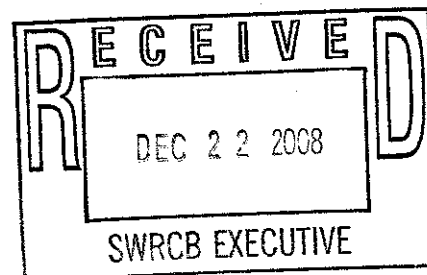
SENT VIA ELECTRONIC MAIL

22 December 2008

Jeanine Townsend, Clerk to the Board
State Water Resources Control Board
1001 I Street, 24th Floor
Sacramento, CA 95814
commentletters@waterboards.ca.gov

Reference: Comment Letter on Proposed Recycled Water Policy

Dear Board Members:



The State Water Resources Control Board ("SWRCB") has requested comments on the Proposed Recycled Water Policy (proposed policy). These comments are submitted on behalf of the San Joaquin River Group Authority ("SJRG") and only focus on the portion of the proposed policy dealing with development of salt management plans for all river basins.

Developing a salt management plan is a complex undertaking. The SJRG doubts that a reliable and well thought out plan, for all the river basins of the Central Valley, can be developed and adopted in five years, as proposed. An alternative is to use a broad brush approach similar to the approach used with the Salt and Boron TMDL for the San Joaquin River. Unfortunately this TMDL lumps all salt together and misses the reality that there are various types of salt in a river basin and these different types of salt should be dealt with differently for regulatory purposes. The complexity of developing a salt management plan must to be recognized in this proposed policy in order for any such plans to be reasonable.

All water contains some salt. Then, within any basin there are three types of salt that could be in solution.

First, there is salt introduced into a water supply such as brines, water softeners or oil field wastewaters. The Regional Boards have extensive experience in dealing with these salts since the source can be regulated or eliminated.

Second, there is the type of salt that comes from unique areas where the salt is mobilized as the result of an activity such as irrigation or disposing of wastewater on land known to be high in natural salt. Control of these sources involves developing management practices that minimize the movement of this salt into usable water supplies. The State and the Central Valley Boards have been addressing this problem for the past 40 years, with limited success.

The third type of salt, and by far the largest, results from consumptive use of water. All living things consumptively use water and leave the salts behind. These beneficial uses do not add salt;

they simply concentrate the salts already in the water supply. Plants, humans and other animals all concentrate salts. Agricultural and urban irrigation, domestic water use and evaporation from lakes and reservoirs all contribute to concentration of salts in the water supply. Reducing this salt load means reducing beneficial water use. Trying to regulate water use with a salt management plan clearly opens up a whole different and unnecessary water rights controversy.

In summary, any proposed salt management policy needs to consider the various sources of salt and whether all of these types of salt can or should be considered for regulation. The SWRCB must address these issues clearly in their policy direction to the Regional Boards. This will avoid the mistakes of the past and result in far less appeals of the plans once they are adopted.

If you have any questions, please contact me at (530) 758-8633.

Sign by:

Dennis W. Westcot

Project Administrator

San Joaquin River Group Authority

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cc: Allen Short, Coordinator

Tim O'Laughlin

SJRGGA Managers